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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

# **IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION**

## THIS DOCUMENT RELATES TO:

*In re Google Play Consumer Antitrust Litigation*, Case No. 3:20-cv-05761-JD

*State of Utah et al. v. Google LLC et al.,*  
Case No. 3:21-cv-05227-JD

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Case No. 3:21-md-02981-JD

**NOTICE OF EXECUTED  
SETTLEMENT AND STIPULATED  
[PROPOSED] ORDER REGARDING  
DATE FOR FILING MOTION TO  
GIVE NOTICE OF PROPOSED  
*PARENTS PATRIAEE* SETTLEMENT**

Judge: Hon. James Donato

1 Plaintiffs in *State of Utah et al. v. Google LLC et al.*, Case No. 3:21-cv-05227-JD  
 2 (“States”), Plaintiffs in *In re Google Play Consumer Antitrust Litigation*, Case No. 3:20-cv-05761-  
 3 JD (“Consumers”), and Defendants Alphabet Inc., Google LLC, Google Ireland Limited, Google  
 4 Commerce Limited, Google Asia Pacific Pte. Limited, and Google Payment Corp. (collectively,  
 5 “Google”), state as follows:

6

7 **RECITALS:**

- 8 1. On September 5, 2023, States, Consumers, and Google (“Settling Parties”) notified the  
 9 Court that they had reached an agreement in principle to settle this case. (MDL Dkt. 596.)  
 10 2. At the October 12, 2023 status conference, the Settling Parties notified the Court that the  
 11 attorneys general in 53 jurisdictions had approved the settlement and a final executed copy  
 12 was being prepared.  
 13 3. After the October 12, 2023 status conference, the Court entered an order directing the  
 14 States “to file a notice once the settlement agreement has been executed in full, and the  
 15 Court will set a date for the approval motion.” (MDL Dkt. 677 at 1.) The Court also stated  
 16 that it was “amenable to Google’s request that the filing be deferred until the jury trial has  
 17 concluded.” (*Id.*)  
 18 4. The Settling Parties have now finalized their settlement and executed it in full, and are  
 19 preparing to file a Motion to Give Notice of Proposed *Parens Patriae* Settlement in  
 20 accordance with 15 U.S.C. § 15c(c).

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22

23 **NOW, THEREFORE, IT IS STIPULATED AND AGREED, SUBJECT TO THE**  
 24 **APPROVAL OF THE COURT:**

- 25 1. The Settling Parties will file a Motion to Give Notice of Proposed *Parens Patriae*  
 26 Settlement on December 8, 2023, or seven (7) calendar days after the jury renders its  
 27 verdict in *Epic Games Inc. v. Google LLC et al.*, Case No. 3:20-cv-05671-JD, whichever is  
 28 later. If the date for filing falls during the week of December 25, 2023, the Settling Parties

1 will file on January 5, 2024.  
2  
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DATED: November 17, 2023

4 Respectfully submitted,  
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**BARTLIT BECK LLP**  
Karma M. Julianelli  
**KAPLAN FOX & KILSHEIMER LLP**  
Hae Sung Nam  
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8 By: /s/ Karma M. Julianelli  
Karma M. Julianelli  
9

10 *Co-Lead Counsel for Consumer Plaintiffs in In*  
*re Google Play Consumer Antitrust Litigation*

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19 Jonathan I. Kravis  
Justin P. Raphael  
20 Kyle W. Mach  
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By: /s/ Glenn D. Pomerantz  
Glenn D. Pomerantz  
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*Counsel for Defendants Google LLC et al.*

24 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**  
25

26 Dated: \_\_\_\_\_  
27

\_\_\_\_\_  
United States District Judge  
28

1                   **E-FILING ATTESTATION**

2                   I, Brian Wang, am the ECF User whose ID and password are being used to file this  
3 document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each signatory  
4 identified above has concurred in this filing.

5                   /s/ Brian Wang  
6                   Brian Wang

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